

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

DOC NO
RECORDED/FILED

2015 JUN -3 PM 2:10

UNITED STATES OF AMERICA

15 INDICTMENT CR 078 wmc

v.

Case No. _____
18 U.S.C. § 1591 (a) and (b)

MONTA GROCE,

Defendant.

THE GRAND JURY CHARGES:

COUNT 1

Between in or about December 2012, to in or about April 2014, in the Western District of Wisconsin and elsewhere, the defendant,

MONTA GROCE,

knowingly recruited, enticed, harbored, transported, and maintained by any means "Jane Doe 1," in and affecting interstate commerce, knowing that force, threats of force, coercion, and any combination of such means, would be used to cause Jane Doe 1 to engage in a commercial sex act.

(In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1)).

COUNT 2

Between in or about January 2013, to in or about April 2013, in the Western District of Wisconsin and elsewhere, the defendant,

MONTA GROCE,

knowingly recruited, enticed, harbored, transported, and maintained by any means "Jane Doe 2," in and affecting interstate commerce, knowing that force, threats of force, coercion, and any combination of such means, would be used to cause Jane Doe 2 to engage in a commercial sex act.

(In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1)).

COUNT 3

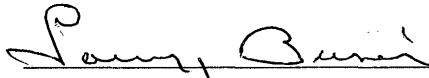
Between in or about January 2013, to in or about March 2013, in the Western District of Wisconsin and elsewhere, the defendant,

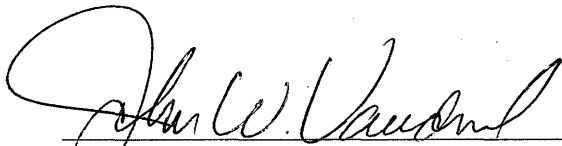
MONTA GROCE,

knowingly recruited, enticed, harbored, transported, and maintained by any means "Jane Doe 3," in and affecting interstate commerce, knowing that force, threats of force, coercion, and any combination of such means, would be used to cause Jane Doe 3 to engage in a commercial sex act.

(In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1)).

A TRUE BILL


PRESIDING JUROR


JOHN W. VAUDREUIL
United States Attorney

Indictment returned: 6/3/2015